



200 Campus Drive  
Suite 300  
Florham Park, New Jersey 07932  
Telephone: (973) 210-6700  
Facsimile: (973) 210-6701  
Marianne.May@clydeco.us

September 26, 2018

**Via ECF**

Honorable Michael A. Hammer, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & US Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

**Re: Pharmacia Corp. n/k/a Pfizer Inc. v. Arch Specialty Ins. Co. et al.**  
**Docket No.: 2:18-cv-00510-ES-MAH**

---

Dear Judge Hammer:

We are counsel for Defendant Twin City Fire Insurance Company ("Twin City"). Pursuant to paragraph 5 of the Pretrial Scheduling Order in this case (Dkt. No. 56), Twin City provides this brief response to the Letter Motion to Compel production of documents ("Motion") filed by Plaintiff Pharmacia Corporation n/k/a Pfizer, Inc. ("Plaintiff").

As we discuss below, counsel for Plaintiff and for Twin City have conferred further since Plaintiff filed its Motion last week. Plaintiff and Twin City are very close to resolving one issue and remain in discussion on the second. In order to continue these discussions past today's filing deadline, Plaintiff and Twin City have agreed that Twin City will not file a substantive response to the Motion today and will make a further submission on Friday, September 28, either (i) confirming that the motion to compel as to Twin City has been withdrawn by agreement of the parties, or (ii) opposing the Motion in whole or in part.

Should the Court have any questions in the meantime please do not hesitate to contact undersigned counsel.

Respectfully submitted,

**CLYDE & CO US LLP**

A handwritten signature in cursive script that reads "Marianne May".

---

Marianne May (NJ Attorney ID No. 4703-1997)  
200 Campus Drive, Suite 300  
Newark, NJ 07932  
(973) 210-6700



Honorable Michael A. Hammer, U.S.M.J.  
September 26, 2018  
Page 2

Of counsel:

Doug Mangel (admitted *pro hac vice*)  
Gabriela Richeimer (admitted *pro hac vice*)  
1775 Pennsylvania Ave, N.W. 4th Floor  
Washington, D.C. 20006  
(202) 757-5100

cc: All counsel of record (via ECF)